

1 LEONARD T. FINK, ESQ.

Nevada Bar No. 6296

2 NAKESHA S. DUNCAN, ESQ.

3 Nevada Bar No. 11556

SPRINGEL & FINK LLP

4 10655 Park Run Drive, Suite 275

5 Las Vegas, Nevada 89144

Telephone: (702) 804-0706

6 Facsimile: (702) 804-0798

E-Mail: *lfink@springelfink.com*

nduncan@springelfink.com

8 Attorneys for Defendant/Cross-Claimant/Counter-Defendant,

9 *TRIUMPH PROPERTY MANAGEMENT CORPORATION*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 ***

13 JOHN HASTINGS AND JILL HASTINGS,
14 INDIVIDUALLY AND ON BEHALF OF
15 ALL OTHER SIMILARLY SITUATED,

16 Plaintiffs,

17 vs.

18 TRIUMPH PROPERTY MANAGEMENT
19 CORPORATION AND KIXIE ONLINE,
20 INC.,

21 Defendants.

Case No.: 2:16-cv-00213-JAD-PAL

**STIPULATION AND ORDER TO EXTEND
DISCOVERY[FIRST REQUEST]**

22 TRIUMPH PROPERTY MANAGEMENT
23 CORPORATION,

24 Cross-Claimant,

25 vs.

26 KIXIE ONLINE, INC.,

27 Cross-Defendant.

28 {N0345365;1}

STIPULATION AND ORDER TO EXTEND DISCOVERY[FIRST REQUEST]

1 KIXIE ONLINE, INC.,

2
3 Counter-Claimant

4 vs.

5 TRIUMPH PROPERTY MANAGEMENT
6 CORPORATION,

7 Counter-Defendant.
8

9 **STIPULATION AND ORDER TO EXTEND DISCOVERY**
10 **(FIRST REQUEST)**

11 The parties, by and through their respective, undersigned, attorneys of record, hereby submit this
12 Stipulation and Order to Extend Discovery Deadlines, as detailed below.

13 Pursuant to LR IA 6-1, this is the first stipulation for extension of time for discovery submitted
14 by the parties. Pursuant to LR II 26-4, the parties agree to extend the discovery deadlines to allow each
15 party to complete the remaining, necessary discovery.

16 **A. Discovery Completed**

17 The following discovery has been completed:

- 18 1. Plaintiff and Defendants have exchanged FRCP 26 disclosures of witnesses and documents,
19 and supplements thereto;
20 2. Defendant TRIUMPH PROPERTY MANAGEMENT CORPORATION has propounded
21 written discovery upon Plaintiff; and
22 3. Plaintiff has propounded written discovery upon Defendants.

23 **B. Discovery that Remains to Be Completed**

- 24 1. Designation of initial and rebuttal expert reports;
25 2. Depositions of parties;
26 3. Depositions of experts; and
27 4. Additional written discovery, if necessary.

28 {N0345365;1}

1 **C. Reason Why Remaining Discovery Was Not Completed**

2 The parties are still conducting discovery, including subpoenaing necessary records to support
3 their case. This short extension will permit the parties to have additional time so that they will not be
4 forced to expend unnecessary time and money preparing initial expert reports, while attempting to
5 obtain additional discovery, only to require the experts to prepare supplemental reports. It will also
6 allow for the experts to obtain all necessary evidence to provide complete opinions and the adequate
7 basis for such, pursuant to FRCP 26(a)(2)(B). Based on the foregoing, good cause exists to extend the
8 discovery deadlines.

9 **D. Proposed Schedule**

10 The parties propose the following extended schedule:

<u>Discovery to be Completed</u>	<u>Current Deadlines</u>	<u>Proposed Deadlines</u>
Interim Status Report	June 30, 2017	July 7, 2017
Initial Expert Disclosures	June 30, 2017	July 31, 2017
Rebuttal Expert Disclosures	July 31, 2017	August 14, 2017
Close of Discovery	August 29, 2017	August 29, 2017
Dispositive Motions	September 28, 2017	September 28, 2017
Pre-Trial Order	October 27, 2017	October 27, 2017

18 IT IS SO STIPULATED.

19 DATED this 30th day of June, 2017.

 DATED this 30th day of June, 2017.

20 SPRINGEL & FINK LLP

 KAZEROUNI LAW GROUP, APC

21 /s/ *Nakesha S. Duncan, Esq.*

 /s/ *Michael Kind, Esq.*

22 _____
23 LEONARD T. FINK, ESQ.

 MICHAEL KIND, ESQ.

24 Nevada Bar No. 6296

 Nevada Bar No. 13903

25 NAKESHA S. DUNCAN, ESQ.

 7854 W. Sahara Avenue

26 Nevada Bar No. 11556

 Las Vegas, NV 89117

27 10655 Park Run Drive, Suite 275

 Attorneys for *PLAINTIFFS*

28 Las Vegas, Nevada 89144

 Attorneys for Defendant/Cross-

 Claimant/Counter-Defendant,

TRIUMPH PROPERTY MANAGEMENT

CORPORATION

{N0345365;1}

1 DATED this 30th day of June, 2017.

2 SCHLICHTER & SHONACK, LLP

3 /s/ *Jamie L. Keeton, Esq.*

4
5 JAMIE L. KEETON, ESQ.

6 Nevada Bar No. 14068

7 1404 South Jones Boulevard

8 Las Vegas, NV 89146

9 Attorneys for Defendant/Cross- Defendant

10 /Counter- Claimant, *KIXIE ONLINE, INC.*

11 **ORDER**

12 Based on the parties' stipulation and good cause appearing, IT IS HEREBY ORDERED that the
13 discovery deadlines are extended, pursuant to the parties' stipulation.

14 Dated this 30th day of June, 2017.

15
16 
17 UNITED STATES MAGISTRATE JUDGE